

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

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IN RE)
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CHATTANOOGA GAS)
COMPANY ACTUAL COST ADJUSTMENT)
AUDIT FOR THE 12 MONTHS ENDED JUNE)
30, 2004)
)

DOCKET NO. 04-00402

MOTION FOR PROTECTIVE ORDER

COMES NOW Chattanooga Gas Company (the "Company"), pursuant to T C A § 65-3-109, T C A § 65-4-105(a) and Rule 1220-1-2-06 of the Tennessee Regulatory Authority ("TRA") and in the alternative, T C.A. § 4-5-311, hereby files this Motion for Protective Order regarding certain invoices from Sequent Energy Management ("Sequent") The Company previously provided redacted copies of Sequent's invoices By letter dated January 14, 2005, the TRA Staff directed the Company to file unredacted copies of these invoices by January 25, 2005

As grounds for this Motion, the Company would state that the information contained within the Sequent invoices contain trade secrets and information pertaining to confidential contracts and business transactions In addition, the invoices also contain confidential information about third parties not subject to the jurisdiction of the Authority

The Company has attached a proposed protective order to this Motion for consideration by the Authority. In addition, the Company will make the unredacted version of the Sequent invoices available to the Authority staff at the offices of counsel prior to the entry of the protective order

Respectfully submitted:

Chattanooga Gas Company

By *D. Billye Sanders*

D. Billye Sanders

Its Attorney

Waller Lansden Dortch & Davis, PLLC

511 Union Street, Suite 2700

Nashville, TN 37219-1760

(615) 244-6380